

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Staff's Review of Payment Arrangement  
Programs Offered By the Florida Electric  
Industry

Docket No: 120251-EI  
Date: May 15, 2014

**FLORIDA POWER AND LIGHT COMPANY'S FIRST  
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code (2012) ("Rule 25-22.006"), Florida Power & Light Company ("FPL") hereby submits its First Request for Extension of Confidential Classification of Certain Information Contained FPSC Staff's ("Staff") Payment Arrangement Audit Report. FPL states as follows:

1. On October 3, 2012 ("October 3, 2012 Request") FPL filed a Request for Confidential Classification of the Confidential Information of Certain Information Contained Staff's Payment Arrangement Audit Report.. The October 3, 2012 Request included Exhibits A, B, C, and D. By Order No. PSC-12-0629-CFO-EI, dated November 21, 2012 ("Order 0629"), the Commission granted FPL's October 3, 2012 Request. FPL adopts and incorporates by reference the October 3, 2014 Request and Order 0629.

2. The period of confidential treatment granted by Order 0629 will soon expire. The Confidential Information that was the subject of FPL's October 3, 2012 Request and Order 0629 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. Included with this Request is First Revised Exhibit D, which consists of the affidavit of John G. Hall in support of this request. All of the information designated in Exhibit A and

Exhibit B, and referenced in Exhibit C to the October 3, 2012 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. The Confidential Information continues to be treated by FPL as proprietary and confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

5. As the affidavit included in First Revised Exhibit D indicates, certain documents or materials provided by FPL contain information that relates to FPL's competitive interests. FPL asserts that this information is proprietary confidential business information. The materials contain information regarding FPL's business strategies related to FPL's disconnection processes and procedures. Additionally, the material describes FPL's payment arrangement practices. The disclosure of such strategies would negatively impact FPL's ability to assist customers in a fair manner. This information is protected by Section 366.093(3)(e), Florida Statutes.

6. Nothing has changed since the Commission entered Order 0629 to render the Confidential Information stale or public, such that continued confidential treatment would not be appropriate.

7. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat. (2012).

**WHEREFORE**, for the foregoing reasons, as more fully set forth in the supporting affidavit, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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By: /s/ Maria J. Moncada  
Maria J. Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**  
**Docket No. 120251-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification was served by electronic mail this 15th day of May 2014 to the following:

Carl Vinson  
Kevin Carpenter  
Victor Cordiano  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

By: /s/ Maria J. Moncada  
Maria J. Moncada

**Docket No. 120251-EI**

**FIRST REVISED EXHIBIT D**

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Public Service Commission's Review of the Payment Arrangement Programs offered by the Florida Electric Industry

Docket No. 120251-EI

STATE OF FLORIDA )
MIAMI-DADE COUNTY )

AFFIDAVIT OF JOHN G. HALL

BEFORE ME, the undersigned authority, personally appeared John G. Hall who, being first duly sworn, deposes and says:

1. My name is John G. Hall. I am currently employed by FPL as Director, Revenue Recovery. My business address is 9250 West Flagler Street, Miami, Florida, 33174. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents that are included in FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Docket No. 120251-EI, for which I am listed as the affiant. Such documents or materials that I have reviewed and which, in whole or in part, contain or constitute competitively sensitive information should continue to be protected, as the disclosure of the information could impair the competitive business of the provider of the information. Additionally, these materials are asserted by FPL to be proprietary confidential business information. Specifically, the materials contain information regarding FPL's business strategies related to FPL's disconnection processes and procedures. These materials also describe FPL's payment arrangement practices. The disclosure of such strategies would negatively impact FPL's ability to assist customers in a fair manner. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-12-0629-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. In addition, these materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

[Signature of John G. Hall]
John G. Hall

SWORN TO AND SUBSCRIBED before me this 15th day of May, 2014, by John G. Hall, who is personally known to me or who has produced (type of identification) as identification and who did take an oath.

[Signature of Carolyn J. Smith]
Notary Public, State of Florida

My Commission Expires

